

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE	
Plaintiff,	
v.	C.A. NO: 02-CV-4440
TRANS UNION LLC CITY OF PHILADELPHIA	
Defendant.	

JOINT MOTION FOR EXTENSION OF TIME

Trans Union LLC (“Trans Union”) and Plaintiff Grace Lawrence (collectively referred to as the “Parties”), by and through their undersigned attorneys, jointly move that the trial of this case be adjourned from February 23, 2004 and rescheduled on or after March 15, 2004, subject to the conflicts set forth below:

1. Plaintiff commenced this action alleging that Defendant Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* (the “FCRA”) because it reported certain allegedly inaccurate credit information relating to Plaintiff.

2. On December 11, 2003, the Court denied in part and granted in part Trans Union’s motion for summary judgment. Trans Union’s motion for partial reconsideration is pending. On January 9, 2004, the Court scheduled the trial in this action for February 23, 2004 and a final pretrial for February 18, 2004.

3. Counsel for Trans Union have pre-scheduled federal jury trials set for February 23, 2004: Luckman – Ahern v. Trans Union, (D.Ct. 3:01CV 2313 (DJS), Squatrito, J.; counsel for

both Parties are also scheduled to try Evantash v. Trans Union and GE Capital, (E.D.Pa. NO. 02-1188, Davis, J) on March 9, 2004; and counsel for Plaintiff have a trial set in Harvey v. Equifax, (E.D.Pa. NO. 03-3143, Fullam, J) on March 28, 2004 .

4. Counsel for Trans Union, (Luckman) also has prepaid vacation plans (non-refundable flights and hotels at Disneyworld) from March 24 through April 1, 2004.

5. Further, the Parties respectfully submit that the pretrial orders, filed in June 2003, require modification in light of the Court's Order on Summary Judgment and, potentially, the disposition of Trans Union's Motion for Reconsideration.

6. Accordingly, the Parties respectfully request that the January 8, 2004 Order be modified and extended as follows:

- (a) Trial on or after March 15, 2004 (subject to the above conflicts);
- (b) Parties' modified pretrial memoranda, proposed points for charge, proposed jury verdict form, and proposed *voir dire* as well as all pre-trial motions, within ten (10) days of trial;
- (c) All trial exhibits, which are to be pre-marked, to be exchanged within five (5) days of trial;
- (d) Final pre-trial conference to be held in chambers five (5) prior to trial,

7. This extension of time is sought in the interests of justice and is made in good faith and not to unnecessarily delay the trial of this action.

WHEREFORE, Defendant Trans Union LLC and Plaintiff, Grace Lawrence, jointly, respectfully request that this Court grant an extension of time.

Respectfully Submitted this 23rd day of January, 2003

John Soumilas By/S/TPC w/ express permission

MARK E. KOGAN
BRUCE S. LUCKMAN
TIMOTHY P. CREECH
SATZBERG, TRICHON,
KOGAN & WERTHEIMER, P.C.
1818 Market St., 30th Floor
Philadelphia, PA 19103
(215) 575-7600; Fax: (215) 575-7688

*Counsel for Defendant,
Trans Union LLC*

MARK D. MAILMAN
JOHN SOUMILAS
FRANCIS & MAILMAN, P.C.
Land Title Building, 19th Floor
Philadelphia, PA 19110
(215) 735-8600; Fax: (215) 940-8000

Counsel for Plaintiff